

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Kane, et al.

Plaintiffs,

vs.

De Blasio, et al.

Defendants.

DECLARATION OF
ANTHONY G. BLOCH

Civil Action No. 1:21-cv-07863

STATE OF NEW YORK)
) ss.:

COUNTY OF NEW YORK)

Anthony G. Bloch, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true:

1. I am Anthony G. Bloch.
2. I have been a substitute teacher with the NYC DOE since the spring of 2019, now for about two and a half years. As a college adjunct for 18 years, I was interested in also applying my teaching skills in the service of high-needs grade schools. The special education school that nominated me to work as a substitute teacher is the school where I have been working ever since.
3. Part time substitute teacher work has supplemented my income and allowed me to keep my financial commitment toward the support of my teenage daughter, now 19, and in college. It has also given me a new direction in my career, as I have adapted lessons for the special needs of the students whom I teach. For the full recent school year, 2020–2021, I was hired for a regular substitute job, with the same class for two days a week. Just last month, I had informed the administration of my school that I will be available for three days per week this school year, wherever I am needed.
4. NYC schools are chronically short staffed, and my own school is no exception. Although the school has four other sites where I could also work, they have needed

me too much at the main site. And in fall '21, this need is even greater because of the recent shortage of teachers. Substitute teaching for me is not just a job, but an ongoing professional opportunity, and my services are valued at my school. The children really do need experienced educators like me, to help ensure that they do not fall too far behind, and their education does not suffer any more than it already has, due to the special challenges to learning which they have faced.

5. I am also working on getting my master's degree in Education and Special Education, so that I can become a full-time teacher. Thus far, I have earned 21 of the required 36 credits, and have a 4.00 average at Touro Graduate School of Education. Substitute teaching is a vital part of my professional growth, and learning experience, as well as a necessary source of income.
6. On the 23rd of August, '21 I was informed that I need to get the COVID-19 vaccine to keep substitute teaching in the NYC public schools.
7. I have sincerely held religious beliefs that prevent me from taking a COVID-19 vaccine.
8. On September 20th of this year, I attempted to submit a religious exemption through "SOLAS", the system provided for teachers and staff to upload religious or medical exemptions. However, I was offered only Reasonable Accommodation, and the system led me to a form to fill out towards this end. There was never an option to upload my religious exemption letter that I'd completed.
9. So, I emailed the letter to the administration of the school where I am a substitute teacher. But to this day my religious exemption letter has not been accepted, filed, and processed by the Department of Education.
10. On October 1st, 2021, I received an email from the Department of Education stating, "If you do not submit proof of being vaccinated by October 1, 2021, your substitute service will be suspended, and you will be unable to work at the NYC Department of Education in any capacity."
11. Without relief from this Court, I will lose my ability to teach in the NYC public school system, effective on Monday, October 4th. I pray the Court will intervene, for the sake of all involved.


Anthony G. Bloch